

EXHIBIT 80

HIGHLY CONFIDENTIAL

1 UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
2 C.A. No. 20-613-LPS
-----x

3
THOMSON REUTERS ENTERPRISE CENTRE GmbH
4 and WEST PUBLISHING CORPORATION,
5 Plaintiffs,
6 -against-
7 ROSS INTELLIGENCE INC.,
8 Defendant.
9 -----x

10
March 25, 2022
11 10:20 a.m.

12 HIGHLY CONFIDENTIAL
13 ATTORNEYS' EYES ONLY

14
15 Videotaped Deposition of ANDREW
16 MARTENS, a 30(b)(6) Witness in the
17 above-entitled action, held at the
18 offices of Crowell & Moring, 590 Madison
19 Avenue, New York, New York, before Dawn
20 Matera and Theresa Tramondo, Shorthand
21 Reporters and Notaries Public.

22
23 * * *

24
25

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A P P E A R A N C E S :

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By: WARRINGTON PARKER, ESQ.
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KAYVAN M. GHAFARI, ESQ.
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Also Present:

JEANPIERRE GIULIANO,
Thomson Reuters

ANTON EVANGELISTA,
Videographer

~oOo~

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1	THE VIDEOGRAPHER: Good morning.	10:19:23
2	We are going on the record at 10:20	10:20:14
3	a.m. on March 25th, 2020. Please note	10:20:18
4	that the microphones are sensitive and	10:20:24
5	may pick up whispering, private	10:20:26
6	conversations and cellular	10:20:27
7	interference. Please turn off all	10:20:28
8	cell phones or place them away from	10:20:31
9	the microphones as they can interfere	10:20:32
10	with the deposition audio. Audio and	10:20:35
11	video recording will continue to take	10:20:37
12	place unless all parties agree to go	10:20:39
13	off the record.	10:20:42
14	This is media unit 1 of the	10:20:43
15	video-recorded deposition of Andrew	10:20:44
16	Martens taken by counsel for	10:20:47
17	plaintiffs in the matter of Thomson	10:20:50
18	Reuters Enterprise Centre GmbH and	10:20:55
19	West Publishing Corporation versus	10:20:57
20	Ross Intelligence filed in the United	10:21:01
21	States District Court for the District	10:21:04
22	of Delaware, case number 20-613-LPS.	10:21:05
23	This deposition is being held at	10:21:15
24	Crowell & Moring LLP located at 590	10:21:17
25	Madison Avenue, 20th floor, in New	10:21:21

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1	York City.	10:21:23
2	My name is Anton Evangelista	10:21:24
3	from the firm of Veritext and I am the	10:21:27
4	videographer. The court reporter is	10:21:29
5	Dawn Matera from the firm of Veritext.	10:21:31
6	I am not authorized to administer an	10:21:33
7	oath. I am not related to any party	10:21:35
8	in this action, nor am I financially	10:21:37
9	interested in the outcome.	10:21:39
10	Counsel and all present in the	10:21:40
11	room and everyone attending remotely	10:21:43
12	will now state their appearances and	10:21:44
13	affiliations for the record.	10:21:46
14	If there are any objections to	10:21:48
15	proceeding, please state them at the	10:21:49
16	time of your appearance beginning with	10:21:51
17	the noticing attorney.	10:21:53
18	MR. PARKER: My name is	10:21:54
19	Warrington Parker. I am here with	10:21:56
20	Kayvan Ghaffari and I represent	10:21:59
21	Defendant Ross Intelligence.	10:22:01
22	MS. CENDALI: I am Dale Cendali	10:22:03
23	from Kirkland & Ellis. I am here with	10:22:04
24	my colleague Eric Loverro and our	10:22:06
25	client representative Jeanpierre	10:22:08

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1 Giuliano, and we don't have an 10:22:12
2 objection to proceeding, we just note 10:22:16
3 for the record that we all expected to 10:22:18
4 start at 9. It's now 10:15 due to 10:22:20
5 technical issues that Thomson Reuters 10:22:24
6 had nothing to do with, but we're here 10:22:26
7 to proceed. 10:22:29

8 MR. PARKER: That's fine. And 10:22:29
9 just for the record, the technical 10:22:30
10 issues are not technical in some 10:22:32
11 mechanical sense. We had a court 10:22:35
12 reporter issue which we had to solve. 10:22:38
13 And Thomson Reuters was gracious 10:22:40
14 enough to agree to start the 10:22:42
15 deposition at the time that we did, 10:22:44
16 which was approximately 10:15. 10:22:46

17 THE VIDEOGRAPHER: And 10:22:51
18 appearances? 10:22:54

19 MS. CENDALI: I believe I gave 10:22:56
20 the appearances. 10:22:59

21 THE VIDEOGRAPHER: Will the 10:23:00
22 court reporter please swear in the 10:23:01
23 witness. 10:23:02
24
25

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1 A N D R E W M A R T E N S, after
2 having been first duly sworn by Dawn
3 Matera, a Notary Public, was called as a
4 witness and testified as follows: 10:23:13

5 THE VIDEOGRAPHER: Thank you. 10:23:13

6 We may proceed. 10:23:13

7 EXAMINATION BY MR. PARKER: 10:23:14

8 Q. Good morning, Mr. Martens. How 10:23:14
9 are you? 10:23:16

10 A. I'm okay. 10:23:17

11 Q. Have you had your deposition 10:23:17
12 taken before? 10:23:18

13 A. I have. 10:23:19

14 Q. How many times? 10:23:19

15 A. Once. 10:23:20

16 Q. Okay. How long ago? 10:23:21

17 A. 12 years, 15 years. 10:23:26

18 Q. Great. Well, welcome back to 10:23:27
19 the rodeo, as they say. So today I will 10:23:30
20 be asking you questions. Okay? 10:23:33

21 A. Yup. 10:23:34

22 Q. If there is a question you 10:23:35
23 don't understand, please let me know 10:23:38
24 that. I am happy to restate it or figure 10:23:40
25 out how to ask it differently, okay? 10:23:43

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A black and white photograph of a large, multi-story building with a complex facade, featuring numerous windows and architectural details. The building appears to be a government or institutional structure. The image is framed by a thick black border.

[illegible]

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C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF NEW YORK)

I, THERESA TRAMONDO, a Notary
Public within and for the State of New York,
do hereby certify:

That ANDREW MARTENS, the witness
whose deposition is hereinbefore set forth,
was duly sworn by me and that such
deposition is a true record of the testimony
given by the witness.

I further certify that I am not
related to any of the parties to this action
by blood or marriage, and that I am in no
way interested in the outcome of this
matter.

IN WITNESS WHEREOF, I have
hereunto set my hand this 8th day of April,
2022.



THERESA TRAMONDO

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE CENTRE
GMBH and WEST PUBLISHING
CORPORATION,

Plaintiffs, Counterdefendants,

v.

ROSS INTELLIGENCE INC.,

Defendant, Counterclaimant.

C.A. No. 20-613-LPS

**PLAINTIFFS THOMSON REUTERS ENTERPRISE CENTER GMBH
AND WEST PUBLISHING CORPORATION'S NOTICE OF ERRATA
FOR THE DEPOSITION OF ANDREW MARTENS**

I, the undersigned, do hereby declare that I read the deposition transcript of Andrew Martens dated March 25, 2022 and that to the best of my knowledge, said testimony is true and accurate, with the exception of the following changes listed below:

Page	Line	Original Text	Replacement Text	Reason
20	24	"than is the"	"than in the"	Transcription error
21	4	"TR0 549927"	"TR-0549927"	Transcription error
24	7	"in part an, dissented"	"in part and dissented"	Transcription error
25	14-15	"was drawn. And as sort of a navigation date."	"was drawn and acts as sort of a navigation device."	Transcription error
25	25	"headnote 1 is everything"	"headnote 1. It's everything"	Transcription error
26	20	"juris prudence"	"jurisprudence"	Transcription error
27	5	"date"	"aid"	Transcription error
30	3	"West Law"	"Westlaw"	Transcription error
32	8	"provide with headnotes"	"provide cases with headnotes"	Transcription error
32	19, 24, 25	"Brian Jewell"	"Brian Juell"	Transcription error
32	22	"Mike Dane"	"Mike Dahn"	Transcription error
33	20	"Kevin Apple"	"Kevin Appold"	Transcription error

Page	Line	Original Text	Replacement Text	Reason
34	20, 21	“Appled”	“Appold”	Transcription error
35	20	“Mike Dane”	“Mike Dahn”	Transcription error
36	3	“Cathy Difiglia”	“Cathy DiFiglia”	Transcription error
36	4, 12	“Mike Dane”	“Mike Dahn”	Transcription error
36	15	“Kathy Difiglia”	“Cathy DiFiglia”	Transcription error
36	16	“Kathy”	“Cathy”	Transcription error
37	23	“There is a title manager”	“There is a title, ‘Manager,’”	Transcription error
46	13	“It states that it’s of the”	“It states that it’s on the”	Transcription error
51	22	“the policy or guidelines”	“the policies or guidelines”	Transcription error
53	2	“headnoting manual it appears”	“headnoting manual, it appears”	Transcription error
57	10	“appears that”	“appears that way”	Transcription error
57	20	“Abstracting Concrete”	“Abstract and Concrete”	Transcription error
78	15	“opinion on having”	“opinion not having”	Transcription error
92	12-13	“cited citing pairs”	“citing pairs”	Transcription error
105	13-14	“at words and phrases entry”	“at the Words and Phrases entry”	Transcription error
109	11, 18, 21	“medium”	“Medium”	Transcription error
115	4	“before the day”	“before today”	Transcription error
120	20	“case assigned by a state”	“citation assigned by a state”	Transcription error
124	17-19	“state -- the ‘act of state doctrine’ does not establish an exception at”	“statement -- ‘The act of state doctrine does not establish an exception’ at”	Transcription error
133	1	“and identifying”	“and identified”	Transcription error
142	2	“but it isn’t in the long”	“but it is in the wrong”	Transcription error
142	15	“jump sites”	“jump cites”	Transcription error
142	17	“interested in, directly link you”	“interested in, they directly link you”	Transcription error
144	11	“how many SPVs”	“how many SVPs”	Transcription error
156	12	“Have you is seen”	“Have you seen”	Transcription error
162	17	“interleafing information”	“interleaving information”	Transcription error
179	23-24	“understanding what the additional”	“understanding of what the additional”	Transcription error
215	20	“and now how”	“and now have”	Transcription error
239	5	“Mark Kaufman”	“Mark Hoffman”	Transcription error

Page	Line	Original Text	Replacement Text	Reason
256	25	“what those number represent”	“what those numbers represent”	Transcription error
258	17	“Terry Whitehead”	“Teri Whitehead”	Transcription error
Throughout		“Ross”	“ROSS”	Transcription error

Dated: May 9, 2022



Andrew Martens